

SHER TREMONTE LLP

October 9, 2024

**BY ECF**

The Honorable Katherine Polk Failla  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

**Re: *Richard v. Combs et al.*, 24-cv-06848**

Dear Judge Failla:

We write on behalf of our clients, Combs Enterprises LLC, Love Records, Inc., Bad Boy Entertainment Holdings, Inc., Bad Boy Records LLC, Bad Boy Productions Holdings, Inc., Bad Boy Books Holdings, Inc., Sean Combs Capital LLC, Combs Wines and Spirits LLC, Janice Combs Publishing LLC (incorrectly sued as Janice Combs Publishing Inc.), and Janice Combs Publishing Holdings, Inc. (together, the “Defendants”) in the above-referenced case. Pursuant to Rule 2C(i) of the Court’s Individual Rules and Practices, the undersigned respectfully requests an extension of time for the Defendants to answer or otherwise respond to the Complaint.

The present deadlines for Defendants are as follows:

October 10, 2024: Combs Enterprise LLC and Love Records, Inc.

October 14, 2024: Bad Boy Records LLC

October 21, 2024: Bad Boy Entertainment Holdings, Inc.,  
Bad Boy Productions Holdings, Inc.,  
Bad Boy Books Holdings, Inc.,  
Sean Combs Capital LLC,  
Combs Wines and Spirits LLC,  
Janice Combs Publishing LLC, and  
Janice Combs Publishing Holdings, Inc.

The requested extension is necessary to provide counsel with adequate time to review the lengthy Complaint and prepare a response. In light of this, the Defendants respectfully request that the deadline be adjourned to November 20, 2024, for all

Hon. Katherine Polk Failla  
October 9, 2024  
Page 2 of 2

Defendants. This is the Defendants' first request for an extension of time to answer or otherwise respond to the Complaint. Plaintiff consents to this request.

Respectfully submitted,

/s/ Erica A. Wolff

Erica A. Wolff  
Michael Tremonte

cc: All Counsel of Record via ECF

The application for Defendants Combs Enterprises LLC and Love Records, Inc. to answer or otherwise respond to the complaint is GRANTED *nunc pro tunc*.

The application for Defendants Bad Boy Records LLC, Bad Boy Entertainment Holdings, Inc., Bad Boy Productions Holdings, Inc., Bad Boy Books Holdings, Inc., Sean Combs Capital LLC, Combs Wines and Spirits LLC, Janice Combs Publishing LLC, and Janice Combs Publishing Holdings, Inc., is GRANTED.

The deadline for all of the above-mentioned Defendants to answer or otherwise respond to the complaint is hereby ADJOURNED to on or before **November 20, 2024**.

The Clerk of Court is directed to terminate the pending motion at docket entry 61.

Dated: October 10, 2024  
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE